



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

May 19, 2008

Reply To: ECL-115

James M. Anderson, Manager
Portland Harbor Section
DEQ Northwest Region
2020 SW Fourth Ave, Suite 400
Portland, OR 97201

Re: Source Control Decision
Former Mar Com North Parcel
8970 N Bradford Street, Portland, OR
ECSI # 4749

Dear Mr. Anderson:

EPA has reviewed the above referenced Source Control Decision for the Mar Com North Site for consistency with the long-term cleanup of Portland Harbor and consistency with other work being performed within the Portland Harbor Superfund site. Based on the information provided in this document, EPA provides the following comments for DEQ to consider in proceeding forward with its decisions regarding upland source control at this site.

- 1) EPA believes that the release pathways from this property are overland sheet flow runoff, groundwater, bank erosion, and overwater work. Since overwater work is not a current practice at the site, this pathway is not a current source to the river.
- 2) It is our understanding that operations at the Mar Com North parcel have historically been limited to the storage of lumber and shipbuilding supplies. It also appears that waste material was stored on the property due to the fact that two grit piles were identified and removed, as well as 4 waste drums containing soil and water. Contaminants associated with shipbuilding operations generally include metals (e.g., chromium, copper, lead, nickel, and zinc) from abrasive blasting of paints and coatings; tributyltin (TBT) and cuprous compounds (such as cuprous oxide, cuprous thiocyanate and metallic copper powder) from abrasive blasting of antifoulant coatings; waste engine fluids (e.g., Fuel Bunker C and Diesel); contaminated bilge and ballast waters; and PCBs from ships wiring, fluorescent lighting, ventilation gaskets, greases and hydraulic fluids, electric cableway transit box packing putty, paint and electronic components. Two chemicals, TBT and PCBs, were evaluated in the subsurface of the property, yet

these are both hydrophobic chemicals that are not expected to move in groundwater. Further, these chemicals were not evaluated in surface soils at this property where they would be expected to be mobile in sheet flow runoff. The sediment data offshore of this property shows TBT above risk-based SLVs and elevated PCBs. EPA views this as a data gap from this property in the overland runoff pathway. However, if the Port paves the upland property in the future, then this pathway would be eliminated as a pathway of concern.

- 3) The data shows that upland soils are contaminated with arsenic, barium, chromium, copper, lead, zinc and the upland groundwater exceeds MCLs for aluminum, chromium, iron, lead, manganese and nickel. The river sediments are also contaminated with these metals in addition to mercury, selenium and PAHs. Soil samples that exceed SLVs include TP-11, B-28, TP-13, B-26, HB-1, TP-12, B-36, and HB-2. It is unclear from the documentation in the source control decision as to whether these soils (other than HB-2) were part of the soils removed at the site. It does appear that removal of the two abrasive blasting grit areas primarily removed the source of metals contamination in the uplands thus removing the source material that would be released via overland runoff and groundwater pathways.
- 4) Since the bank soils have not been fully characterized at this site, the bank erosion pathway is still a pathway of concern for this property.

Although we think there are some data gaps, EPA believes the proposed redevelopment actions to be taken by the Port, in combination with the source control actions completed as described in the source control determination, are sufficient to adequately control sources of contamination from this property. However, there may be a need for further source control actions at this site in the future to ensure that pollutants from this upland site do not contribute to risk or recontamination of the Portland Harbor Superfund Site (PHSS). If DEQ goes forward with a “no further action” letter, EPA may still require further source control actions under CERCLA.

If you have any questions or would like to discuss the contents of this letter further, please feel free to contact me at (206) 553-6705.

Sincerely,

Kristine Koch
Remedial Project Manager
Portland Harbor Superfund Site